

John Fishwick

From: simonettl@gtlaw.com
Sent: Tuesday, July 2, 2019 12:14 PM
To: John Fishwick
Cc: allenmayed@gtlaw.com; Monica Mroz; ramosc@gtlaw.com; hassm@gtlaw.com; jlong@woodsrogers.com; bwaller@woodsrogers.com; Carrol Ching; Daniel Martin; Amy Guthrie
Subject: Re: W. Henderson v. General Revenue Corporation, et al.

We have reviewed your letter, received yesterday afternoon, and will not be able to respond by tomorrow. I am in a meeting and deposition, and tomorrow is the day before the holiday. We will have to get back to you next week.

Sent from my iPad

On Jul 1, 2019, at 1:32 PM, John Fishwick <John.Fishwick@fishwickandassociates.com> wrote:

EXTERNAL OF GT

Good Afternoon, Attached is correspondence in the above styled case. Thank you for your attention to this matter. Best, John

<image002.jpg><image003.jpg>

John P. Fishwick, Jr. | Fishwick & Associates, PLC
30 Franklin Road, Suite 700 | Roanoke, VA 24011
Phone 540.345.5890 | Facsimile 540.345.5789

john.fishwick@fishwickandassociates.com | www.fishwickandassociates.com

<image005.jpg>

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From: allenmayed@gtlaw.com <allenmayed@gtlaw.com>
Sent: Friday, June 28, 2019 2:40 PM
To: Monica Mroz <Monica.Mroz@fishwickandassociates.com>; John Fishwick <John.Fishwick@fishwickandassociates.com>
Cc: simonettl@gtlaw.com; ramosc@gtlaw.com
Subject: W. Henderson v. General Revenue Corporation, et al.

Dear Counsel,

Attached are Navient Portfolio Management, LLC's responses to plaintiff's interrogatories and request for documents.

Desiree Allen-Maye
Paralegal



Greenberg Traurig, LLP
1840 Century Park East
Suite 1900 | Los Angeles, CA 90067-2121
T +1 310.586.7829 | F +1 310.586.7800 | C +1 818.974.7309
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<image006.png>

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<20190701123023.pdf>

John Fishwick

From: hassm@gtlaw.com
Sent: Tuesday, July 2, 2019 3:33 PM
To: John Fishwick; simonetttil@gtlaw.com
Cc: allenmayed@gtlaw.com; Monica Mroz; ramosc@gtlaw.com; jlong@woodsrogers.com; bwaller@woodsrogers.com; Carrol Ching; Daniel Martin; Amy Guthrie
Subject: RE: W. Henderson v. General Revenue Corporation, et al.

John,

Your blanket assertion that NPM will not comply with your discovery requests is unfounded. Moreover, your rush to file a Motion to Compel without conducting a meet-and-confer violates the Court's rules. We are happy to confer with you so that we can narrow the issues in dispute, but we have simply asked for more time to review and respond to the issues raised in your letter. Demanding total compliance with your demands in two days, during a holiday week, and when we have informed you that we are in depositions and meetings, is simply unreasonable and is not in good faith.

We will gladly to set up a time with you next week after the holiday to discuss your letter and work with you in good faith to narrow any disputed issues, just as both sides have done throughout discovery to date; to that end, please let us know when you are available for a meet-and-confer. Should you file a Motion to Compel in the meantime, without such a good faith attempt to confer with us, we will be sure to note the same in any response to the Court.

Thank you,
Mike

Michael A. Hass
Associate

Greenberg Traurig, LLP
1750 Tysons Boulevard, Suite 1000 | McLean, VA 22102
T +1 703.749.1300
hassm@gtlaw.com | www.gtlaw.com | [View GT Biography](#)



From: John Fishwick [mailto:John.Fishwick@fishwickandassociates.com]
Sent: Tuesday, July 2, 2019 1:31 PM
To: Simonetti, Lisa (Shld-LA-LT) <simonetttil@gtlaw.com>
Cc: Allen-Maye, Desiree (Para-LA-LT) <allenmayed@gtlaw.com>; Monica Mroz <Monica.Mroz@fishwickandassociates.com>; Ramos, Christopher R. (Assoc-LA-LT) <ramosc@gtlaw.com>; Hass, Michael A. (Assoc-NVA-LT) <hassm@gtlaw.com>; jlong@woodsrogers.com; bwaller@woodsrogers.com; Carrol Ching <Carrol.Ching@fishwickandassociates.com>; Daniel Martin <daniel.martin@fishwickandassociates.com>; Amy Guthrie <Amy.Guthrie@fishwickandassociates.com>
Subject: RE: W. Henderson v. General Revenue Corporation, et al.

Good Afternoon:

Since your client is not going to comply with our discovery requests, we, as noted in our July 1, 2019 letter, will promptly file a motion to compel and ask the Court for some hearing dates. Best, John



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